

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KEN JOHANSEN, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

LIBERTY MUTUAL GROUP, INC., and SPANISH
QUOTES, INC. d/b/a WESPEAKINSURANCE,

Defendants,

LIBERTY MUTUAL GROUP, INC.,

Cross-Claimant,

v.

SPANISH QUOTES, INC. d/b/a
WESPEAKINSURANCE,

Cross-Defendant,

LIBERTY MUTUAL GROUP, INC., LIBERTY
MUTUAL INSURANCE COMPANY,

Third-Party Plaintiffs,

v.

PRECISE LEADS, INC., and DIGITAS, INC.,

Third-Party Defendants.

**CIVIL ACTION
NO. 1:15-cv-12920-ADB**

THIRD-PARTY DEFENDANT DIGITAS' MOTION FOR SUMMARY JUDGMENT

Third-Party Defendant Digitas, Inc. ("Digitas") moves this Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure, for summary judgment on the Third-Party Complaint of Third-Party Plaintiffs Liberty Mutual Group, Inc. and Liberty Mutual Insurance Company.

In support of this motion, Digitas submits the accompanying Memorandum, Statement of Undisputed Material Facts, and Affidavit of Laura Greenberg-Chao with exhibits.

Respectfully submitted,

DIGITAS INC., d/b/a DIGITASLBI,

By its attorneys,

/s/ Laura Greenberg-Chao

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Dated: February 28, 2019

LOCAL RULE 7.1 CERTIFICATION

I, John Frey, counsel for Digitas, hereby certify that I conferred with counsel for Liberty Mutual in a good faith attempt to resolve or narrow the issues concerning this request.

/s/ John Frey

CERTIFICATE OF SERVICE

I, Laura Greenberg-Chao, certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 28, 2019.

/s/ _____ Laura Greenberg-Chao